

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Federal-State Joint Board on)	
Universal Service)	CC Docket No. 96-45
)	
1998 Biennial Regulatory Review –)	
Streamlined Contributor Reporting)	CC Docket No. 98-171
Requirements Associated with Administration)	
of Telecommunications Relay Service, North)	
American Numbering Plan, Local Number)	
Portability, and Universal Service Support)	
Mechanisms)	
)	
Telecommunications Services for Individuals)	
with Hearing and Speech Disabilities, and the)	CC Docket No. 90-571
Americans with Disabilities Act of 1990)	
)	
Administration of the North American)	
Numbering Plan and North American)	CC Docket No. 92-237
Numbering Plan Cost Recovery Contribution)	NSD File No. L-00-72
Factor and Fund Size)	
)	
Number Resource Optimization)	CC Docket No. 99-200
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170
)	
)	

REPLY COMMENTS OF NRTA AND OPASTCO

I. INTRODUCTION AND SUMMARY

The National Rural Telecom Association (NRTA) and the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) submit

these reply comments in response to comments filed in the above-captioned proceedings.¹ The Commission is considering whether to retain its recently modified revenues-based methodology for assessing universal service contributions or to adopt any of several proposals that base contributions on the number and capacity of “connections” provided to a public network. NRTA is an association of incumbent local exchange carriers (ILECs) that obtain financing under Rural Utilities Service (RUS) and Rural Telephone Bank (RTB) programs. OPASTCO is a national trade association representing approximately 500 small ILECs serving rural areas of the United States. All of the members of both associations are rural telephone companies as defined in 47 U.S.C. §153(37). In addition, almost all of the members of both associations rely on some form of federal universal service funding to provide affordable, high-quality service within their high-cost, rural territories.

Comments in response to the Commission’s Second Further Notice of Proposed Rulemaking (SFNPRM) overwhelmingly confirm NRTA and OPASTCO’s earlier conclusion that both the “connections-based” proposal with a mandatory minimum contribution obligation and the telephone number-based methodology are inherently unlawful and should be discarded. Moreover, a number of commenters agree with NRTA and OPASTCO that only the proposal for splitting contributions between exchange access and interstate transport providers would comply with the requirement set forth in the Telecommunications Act of 1996 (1996 Act, the Act) that calls for “equitable and nondiscriminatory” contributions from all interstate telecommunications carriers. Lastly, NRTA and OPASTCO agree with those commenters that urge the Commission to require all facilities-based broadband Internet access providers to contribute, regardless of what contribution methodology it ultimately decides upon.

¹ *Federal-State Joint Board on Universal Service, et.al.*, CC Docket No. 96-45, *et.al.*, Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 24952 (2002) (SFNPRM).

II. THE RECORD DEMONSTRATES THAT BOTH THE “CONNECTIONS-BASED” PROPOSAL WITH A MANDATORY MINIMUM CONTRIBUTION REQUIREMENT AND THE TELEPHONE NUMBER-BASED PROPOSAL MUST BE REJECTED SINCE THEY ARE UNLAWFUL AND INHERENTLY FLAWED

Except for the proponents of the original Coalition for Sustainable Universal Service (CoSUS) “connections-based” proposal, commenters unanimously oppose both the modified version of this plan, which now includes a mandatory minimum contribution requirement (Proposal One), and the telephone number-based connections plan (Proposal Three).

Commenters explain that, even as modified by the Commission, Proposal One still suffers from the same fundamental flaw as the initial CoSUS “connections-based” scheme: its failure to comply with Section 254(d)’s requirement that every interstate telecommunications carrier must contribute on an *equitable and nondiscriminatory basis*.² The record in this proceeding also indicates that the telephone number-based proposal would likewise result in inequitable and discriminatory contributions, since it relies upon a premise that is not rationally related to identifying those carriers that actually provide interstate telecommunications services.³

Both Proposal One and Proposal Three continue to place the overwhelming majority of the contribution burden on those carriers that provide end-users with a connection to the public switched network. As the Commission’s recent contribution methodology staff study demonstrates, local exchange carriers (LECs), who provide the vast majority of local end-user

² See, California Public Utilities Commission (CA PUC), pp. 14-16; Fred Williamson and Associates (FWA), pp. 7-12; National Association of State Utility Consumer Advocates (NASUCA), pp. 20-21; Nextel, pp. 9-11; National Telecommunications Cooperative Association (NTCA), pp. 3-4; SBC/BellSouth, pp. 15-18; TracFone Wireless Inc. (TracFone), pp. 17-22; United States Telecom Association (USTA), pp. 4-6; Verizon, pp. 9-12; Verizon Wireless, pp. 8-10; Western Alliance, p. 12.

³ See, CA PUC, pp. 22-29; Consumers Union, Texas Office of Public Utility Counsel, Consumer Federation of America, Appalachian People’s Action Coalition, Center for Digital Democracy, Edgemont Neighborhood Coalition, and Migrant Legal Action Program (Consumers Union, *et al*), pp. 13-15; FWA, pp. 20-21; Nextel, pp. 15-18; NTCA, pp. 3-4; SBC/BellSouth, pp. 15-22; TracFone, pp. 24-26; USTA, pp. 4-6; Verizon, pp. 9-12; Verizon Wireless, p. 18; Virgin Mobile USA, pp. 17-18; Western Alliance, p. 12.

connections, would be responsible for at least fifty percent of total universal service contributions under either of these two plans.⁴ Conversely, interexchange carriers' (IXCs) contribution requirement under both Proposal One and Three would be largely reduced, as was the case with the original CoSUS plan.⁵ Specifically, in 2004, IXCs' share of the contribution responsibility would be reduced by fifty-five percent under Proposal One and by seventy-three percent under Proposal Three, as compared to their share under the Commission's modified revenues-based system.⁶ Thus, carriers that merely provide exchange access to carriers that actually transport calls across state lines would be forced to shoulder an inequitably disproportionate share of the contribution responsibility. Clearly, neither Proposals One nor Three would result in interstate transport providers contributing on a basis that could reasonably be considered "equitable and nondiscriminatory," as Section 254(d) demands.

Commenters also highlight the fact that Proposal Three's use of telephone numbers assigned to end users is not a rational basis for identifying "[e]very telecommunications carrier that provides interstate telecommunications services."⁷ In its comments, NRTA and OPASTCO pointed out that telephone numbers assigned to end users do not enable them to secure interstate transmission at all unless they establish a presubscribed or other (e.g., prepaid card or dial-around) relationship with a carrier that actually provides transmission service across state lines.⁸ Additionally, Nextel has correctly stated that "a numbers-based plan would explicitly hand a free pass to broadband providers – who [also] do not use telephone numbers at all in the provision of telecommunications – from any contribution obligation in the future."⁹ Therefore, the use of

⁴ *Commission Seeks Comment on Staff Study Regarding Alternative Contribution Methodologies*, CC Docket No. 96-45, *et.al.*, Public Notice, FCC 03-31, pp. 6, 8 (rel. Feb. 26, 2003) (Staff Study).

⁵ *See*, FWA, pp. 8-9; NASUCA, p. 20; NTCA, p. 3; SBC/BellSouth, pp. 15, 18.

⁶ Staff Study, pp. 6, 8.

⁷ *See*, SBC/BellSouth, pp. 17-18; Verizon Wireless, p. 18; Virgin Mobile USA, p. 17.

⁸ NRTA and OPASTCO, p. 7.

⁹ Nextel, p. 15.

telephone numbers is an inappropriate basis for identifying the service providers who are required to fund the universal service mechanisms.

The record in this proceeding also indicates that the addition of a mandatory minimum assessment to either the modified CoSUS plan or to a numbers-based approach would not bring either proposal into compliance with the Act.¹⁰ SBC/BellSouth agrees with NRTA and OPASTCO that, while a minimum contribution obligation from IXC's and other primarily non-connections based carriers would guarantee that these carriers at least contribute something to universal service, such contributions would not have a reasonable correlation to those carrier's actual interstate activities.¹¹ For instance, requiring entirely non-connections-based interstate carriers, such as long-distance resellers, to contribute based upon one percent of their annual interstate revenues would not appropriately reflect the entirely interstate service that they provide. These and other interstate carriers would still be sheltered from fulfilling their statutory lead role in contributing to universal service.

Commenters have recognized that both Proposal One and Proposal Three are unlawful since they place the vast majority of the contribution burden on providers of exchange access, who are merely adjuncts to the state-boundary-crossing services provided by interstate transport carriers. Furthermore, the mere addition of a minimum contribution requirement to a methodology that fails to assess the clearest and most essential interstate telecommunications carriers still contravenes Section 254(d)'s requirement that that all interstate carriers contribute "on an equitable and nondiscriminatory basis."

¹⁰ See, TracFone, p. 19; USTA, p. 5; Verizon, p. 9; Virgin Mobile USA, p. 6.

¹¹ See, SBC/BellSouth, p. 15. See also, NRTA and OPASTCO, pp. 4-5.

III. THE COMMISSION SHOULD FOCUS ON CONSTRUCTING A LAWFUL “CONNECTIONS-BASED” CONTRIBUTION METHODOLOGY BASED UPON SPLITTING CONTRIBUTIONS BETWEEN SWITCHED TRANSPORT AND ACCESS PROVIDERS

A number of commenters agree with NRTA and OPASTCO that of the three “connections-based” proposals, only Proposal Two, which would assess contributions on both interstate transport and exchange access providers, lawfully complies with the Act’s mandate for equitable and nondiscriminatory contributions.¹² Comments in this proceeding demonstrate that an approach that evenly divides each “connections-based” contribution between the long distance provider and the local service provider would result in every interstate carrier contributing “on an equitable and nondiscriminatory basis” as required by Section 254(d).¹³ This is because all interstate telecommunications requires both a connection to a local distribution network and a connection to an interstate transport provider. As SBC/BellSouth point out, a split “connections-based” methodology would also comply with the Commission’s own universal service principle of competitive neutrality,¹⁴ since it would be consistent in assessing connections to the actual interstate transmission network, regardless of who provides them or how the function is achieved.¹⁵

Moreover, Proposal Two is administratively workable. Commenters confirm that IXC’s do have the information needed to determine their switched-transport-based contribution obligations under this proposal.¹⁶ Specifically, IXC’s could determine their universal service contributions on the basis of end-user information that they already collect for billing and other

¹² See, FWA, pp. 3, 17-20; Qwest, p. 4; SBC/BellSouth, pp. 8-15; USTA, p. 2, 6-8; Western Alliance, pp. 26-28.

¹³ See, FWA, p. 18; SBC/BellSouth, p. 14; Western Alliance, p. 27.

¹⁴ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 8801-8802, paras. 47-48 (1997).

¹⁵ SBC/BellSouth, p. 14.

¹⁶ See, Qwest, p. 5; SBC/BellSouth, p. 10; USTA, p. 6; Western Alliance, pp. 27-28.

service related purposes.¹⁷ However, if IXC's persist in their claims that LECs will not provide information and/or that they cannot derive the information about their customer connections themselves, then the Commission should assess IXC's transport network share of the contribution obligation on the basis of each IXC's relative share of total interstate end-user revenues, as some have suggested.¹⁸

While there is still work that needs to be done on Proposal Two – particularly in regard to devising a rational system for determining capacity-based assessments¹⁹ – this is the only “connections-based” proposal that has emerged thus far that is consistent with the plain language of Section 254(d). Therefore, the Commission should abandon Proposals One and Three and focus its efforts on fashioning a workable and sustainable system where “connections-based” contributions are split between switched transport and exchange access providers.

IV. REGARDLESS OF ITS ULTIMATE DECISION REGARDING THE UNIVERSAL SERVICE CONTRIBUTION METHODOLOGY, COMMENTERS URGE THAT THE COMMISSION REQUIRE ALL FACILITIES-BASED BROADBAND INTERNET ACCESS PROVIDERS TO CONTRIBUTE

Several commenters note that one obvious step to “ensure the stability and sufficiency of the universal service fund (USF) as the marketplace continues to evolve”²⁰ would be to simultaneously require all facilities-based broadband Internet access providers to contribute to universal service as part of any further revisions to the contribution methodology.²¹

¹⁷ According to Qwest, “in some cases [...] information is obtained by the IXC directly from end users; in others, the information is obtained for billing purposes from the LEC through Customer Account Record Exchange or other means.” Qwest, p. 5.

¹⁸ See, Qwest, Attachment A, p. 1; SBC/BellSouth, pp. 9-10; USTA, p. 7. See also, NRTA and OPASTCO, p. 6.

¹⁹ For instance, the CA PUC “recommends that [capacity-based] assessments for multi-line business connections be restructured to avoid the large jumps in assessments between tiers indicated in the SFNPRM.” CA PUC, p. 17. This is because, as currently proposed, “they will adversely impact purchase and upgrade decisions at or near the tier boundaries.” Western Alliance, p. 28. See also, NRTA and OPASTCO, pp. 10-12.

²⁰ *Federal-State Joint Board on Universal Service, et.al.*, CC Docket No. 96-45, *et.al.*, Further Notice of Proposed Rulemaking, 17 FCC Rcd 3752, 3759, para. 15 (2002).

²¹ See, FWA, pp. 5-6; NTCA, p. 3; Qwest, p. 2; USTA, p. 10; Western Alliance, p. 6.

Commenters agree with the Commission that it already has the authority under Section 254(d) of the 1996 Act to adopt such a measure.²² As the Commission is aware, since consumers continue to use broadband platforms and Internet Protocol (IP) networks as substitutes for traditional voice services, interstate usage continues to migrate away from carriers who currently contribute to universal service. Broadening the list of contributors to include all facilities-based broadband Internet access providers would ensure that this trend does not destabilize the fund further.

As FWA correctly asserts, since service providers utilizing broadband platforms and IP networks also provide “access to the public network and [are] capable of transmission of telephone calls to subscribers on the public network, it is appropriate that all facilities-based providers of broadband [...] should be assessed.”²³ More importantly, requiring all broadband Internet access providers to contribute would broaden the contribution base, thereby ensuring that the USF will not be “reliant on a smaller, less-diversified group of contributors.”²⁴ Furthermore, as USTA notes, requiring facilities-based broadband Internet access providers over all platforms to contribute would ensure that there is parity in how all broadband transmission service is treated as part of the Commission’s universal service assessment process.²⁵ Thus, by requiring all facilities-based broadband Internet access providers to contribute to the fund, the Commission can at once ensure the future stability and sufficiency of the USF and also eliminate the growing potential that its contribution rules will skew a consumer's choice of broadband provider.

²² See, NTCA, p. 3; Western Alliance, p. 6. See also, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report to Congress, 13 FCC Rcd 11501, 11534-11535, para. 69 (1998).

²³ FWA, p. 5.

²⁴ Arch Wireless Operating Company Inc., p. 10.

²⁵ See, USTA, p. 10.

V. CONCLUSION

The record demonstrates that of the three “connections-based” methodologies proposed in the SFNPRM, only Proposal Two can satisfy the Section 254(d) requirement that all interstate telecommunications carriers must contribute to universal service on an equitable and nondiscriminatory basis. NRTA and OPASTCO agree with the majority of commenters that urge the Commission to reject Proposals One and Three and devote its attention to perfecting a methodology that splits “connections-based” contributions between switched transport and exchange access providers. NRTA and OPASTCO also strongly urge the Commission to require all facilities-based broadband Internet access providers to contribute to universal service as part of any future revision of the contribution methodology.

Respectfully submitted,

NATIONAL RURAL TELECOM ASSOCIATION

By: \s\ John F. O’Neal
John F. O’Neal

One Massachusetts Avenue, NW, Suite 800
Washington, D.C. 20001
(202) 628-0210

THE ORGANIZATION FOR THE
PROMOTION AND ADVANCEMENT OF
SMALL TELECOMMUNICATIONS
COMPANIES

By: \s\ Stuart Polikoff
Stuart Polikoff
Jeffrey W. Smith

21 Dupont Circle NW, Suite 700
Washington, DC 20036
(202) 659-5990

April 18, 2003

CERTIFICATE OF SERVICE

I, Jeffrey W. Smith, hereby certify that a copy of the joint comments by the National Rural Telecom Association and the Organization for the Promotion and Advancement of Small Telecommunications Companies was sent by first class United States mail, postage prepaid, on this, the 18th day of April, 2003, to those listed on the attached list.

By: /s/ Jeffrey W. Smith
Jeffrey W. Smith

SERVICE LIST

**CC Docket Nos. 96-45, 98-171, 90-571, 92-237,
99-200, 95-116, and 98-179**

Kathleen Q. Abernathy,
Commissioner and Chair
Joint Board on Universal Service
Federal Communications Commission
445 12th Street, S.W., Room 8-B115
Washington, D.C. 20554

Kevin J. Martin,
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 8-A204
Washington, D.C. 20554

Michael J. Copps,
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 8-A302
Washington, D.C. 20554

Jonathan Adelstein,
Commissioner
Federal Communications Commission
445 12th Street, S.W., Room 8-C302
Washington, D.C. 20554

Bob Rowe,
Commissioner
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Nanette G. Thompson,
Chair
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1693

Chairman Michael Powell
Federal Communications Commission
445 12th Street, S.W., Room 8-B201
Washington, D.C. 20554

Lila A. Jaber, Commissioner
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

J. Thomas Dunleavy, Commissioner
New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Greg Fogleman,
Economic Analyst
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

Mary E. Newmeyer,
Federal Affairs Advisor
Alabama Public Service Commission
100 N. Union Street, Suite 800
Montgomery, AL 36104

Joel Shifman,
Senior Advisor
Maine Public Utilities Commission
242 State Street
State House Station 18
Augusta, ME 04333-0018

Carl Johnson,
Telecom Policy Analyst
New York Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

Peter Bluhm,
Director of Policy Research
Vermont Public Service Board
Drawer 20
112 State Street, 4th Floor
Montpelier, VT 05620-2701

Lori Kenyon,
Common Carrier Specialist
Regulatory Commission of Alaska
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1693

Charlie Bolle,
Policy Advisor
Nevada Public Utilities Commission
1150 E. Williams Street
Carson City, NV 89701-3105

Jennifer Gilmore,
Principal Telecommunications Analyst
Indiana Utility Regulatory Commission
Indiana Government Center South
302 West Washington Street, Suite E306
Indianapolis, ID 46204

Peter Pescosolido,
Chief, Telecom & Cable Division
State of Connecticut
Dept. of Public Utility Control
10 Franklin Square
New Britain, CT 06051

Michael Lee,
Technical Advisor
Montana Public Service Commission
1701 Prospect Avenue
P.O. Box 202601
Helena, MT 59620-2601

Jeff Pursley
Nebraska Public Service Commission
300 The Atrium, 1200 N. Street
P.O. Box 94927
Lincoln, NE 68509-4927

Billy Jack Gregg
Consumer Advocate Division
Public Service Commission of
West Virginia
723 Kanawha Boulevard, East
7th Floor, Union Building
Charleston, West Virginia 25301

Larry Stevens,
Utility Specialist
Iowa Utilities Board
350 Maple Street
Des Moines, IA 50319

Philip McClelland
Assistant Consumer Advocate
Pennsylvania Office of Consumer
Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Barbara Meisenheimer,
Consumer Advocate
Missouri Office of Public Counsel
301 West High Street, Suite 250
Truman Building
P.O. Box 7800
Jefferson City, MO 65102

Earl Poucher,
Legislative Analyst
Office of the Public Counsel
State of Florida
111 West Madison, Room 812
Tallahassee, FL 32399-1400

Brad Ramsay,
General Counsel
NARUC
1101 Vermont Avenue, N.W.
Suite 200
Washington, D.C. 20005

David Dowds,
Public Utilities Supervisor
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gerald Gunter Building
Tallahassee, FL 32399-0850

Matthew Brill,
Legal Advisor
Federal Communications Commission
445 12th Street, S.W., Room 8-B115
Washington, D.C. 20554

Daniel Gonzalez,
Senior Legal Advisor
Federal Communications Commission
445 12th Street, S.W., Room 8-A204
Washington, D.C. 20554

Lisa Zaina,
Senior Legal Advisor
Federal Communications Commission
445 12th Street, S.W., Room 8-C302
Washington, D.C. 20554

Carol Matthey,
Deputy Bureau Chief
Federal Communications Commission
Wireline Competition Bureau
445 12th Street, S.W., Room 5-C451
Washington, D.C. 20554

Katherine Schroder,
Senior Advisor
Federal Communications Commission
Wireline Competition Bureau
445 12th Street, S.W., Room 5-A426
Washington, D.C. 20554

Sharon Webber,
Deputy Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A425
Washington, D.C. 20554

Eric Einhorn,
Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A426
Washington, D.C. 20554

Anita Cheng,
Assistant Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A445
Washington, D.C. 20554

Shannon Lipp,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A523
Washington, D.C. 20554

Katie King,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-B544
Washington, D.C. 20554

Geoff Waldau,
Economist
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-B524
Washington, D.C. 20554

Dana Walton-Bradford,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A314
Washington, D.C. 20554

William Scher,
Assistant Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-B550
Washington, D.C. 20554

Paul Garnett,
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A623
Washington, D.C. 20554

Diane Law Hsu,
Deputy Division Chief
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 6-A360
Washington, D.C. 20554

Bryan Clopton,
Mathematician
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 5-A465
Washington, D.C. 20554

Jennifer Schneider
Attorney
Federal Communications Commission
WCB, Telecommunications Access
Policy Division
445 12th Street, S.W., Room 6-C212
Washington, D.C. 20554

Sheryl Todd
Telecommunications Access
Policy Division
Federal Communications Commission
445 12th Street, S.W., Room 5-B540
Washington, D.C. 20554

Peter Lurie
Virgin Mobile USA
10 Independence Boulevard
Warren, New Jersey 07059

Helen Disenhaus
Douglas Orvis
Swidler Berlin Shereff Friedman, LLP
Counsel for Virgin Mobile
3000 K Street, NW, Suite 300
Washington, D.C. 20007

James Bachtell
Angela Campbell
Michael Garcia
Institute for Public Representation
Georgetown University Law Center
Counsel for CU, *et al.*
600 New Jersey Avenue, NW
Washington, D.C. 20001

Mark Cooper
Consumer Federation of America
1424 16th Street, NW
Suite 604
Washington, D.C. 20036

Laurie Pappas
Texas Office of Public Utility Counsel
1701 North Congress Avenue
Suite 9-180
P.O. Box 12397
Austin, Texas 78711-2397

Angela Brown
Richard Sbaratta
BellSouth Corporation
675 West Peachtree Street, NE
Atlanta, Georgia 30375

Jeffrey Brueggman
Gary Phillips
Paul Mancini
SBC Communications
1401 Eye Street, NW, Suite 400
Washington, D.C. 20005

Marie Guillory
Daniel Mitchell
National Telecommunications
Cooperative Association
4121 Wilson Boulevard, 10th Floor
Arlington, Virginia 22203

Frederic Williamson
Fred Williamson & Associates, Inc.
2921 East 91st Street, Suite 200
Tulsa, Oklahoma 74137-3355

Lawrence Sarjeant
Indra Sedhev Chalk
Michael McMenamin
Robin Tuttle
United States Telecom Association
1401 H Street, NW, Suite 600
Washington, D.C. 20005

Mitchell Brecher
Nancy Boocker
Greenberg Traurig, LLP
Counsel for TracFone Wireless
800 Connecticut Avenue, NW, Suite 500
Washington, D.C. 20006

Leonard Kennedy
Lawrence Krevor
Garnet Goins
Nextel Communications
2001 Edmund Halley Drive
Reston, Virginia 20191

Laura Phillips
Laura Gallagher
Drinker Biddle & Reath LLP
Counsel for Nextel
1500 K Street, NW, Suite 1100
Washington, D.C. 20005-1209

Robert Tongren
David Bergmann
National Association of State Utility
Consumer Advocates
8300 Colesville Road, Suite 101
Silver Spring, Maryland 20910

Gary Cohen
Lionel Wilson
Jonady Hom Sun
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

John Scott
Anne Hoskins
Lolita Smith
Verizon Wireless
1300 I Street, NW
Suite 400 West
Washington, D.C. 20005

Craig Brown
Sharon Devine
Qwest Communications
1020 19th Street, NW, Suite 700
Washington, D.C. 20036

Lawrence Katz
Michael Glover
Edward Shakin
Counsel for Verizon
c/o Verizon
1515 North Court House Road
Suite 500
Arlington, Virginia 22201

Gerard Duffy
Blooston, Mordkofsky, Dickens,
Duffy & Prendergast
Counsel for the Western Alliance
2120 L Street, NW, Suite 300
Washington, D.C. 20037

Carolyn Groves
Brian Higgins
Wilkinson Barker Knauer, LLP
Counsel for Arch Wireless
2300 N Street, NW, Suite 700
Washington, D.C. 20037-1128

John Nakahata
Michael Grable
Harris, Wiltshire & Grannis LLP
Counsel for AT&T
1200 Eighteenth Street, NW, Suite 1200
Washington, D.C. 20036

Marybeth Banks
Richard Juhnke
Jay Keithley
Sprint Corporation
401 9th Street, NW, # 400
Washington, D.C. 20004

Richard Whitt
Alan Buzacott
Lori Wright
WorldCom, Inc.
1133 19th Street, NW
Washington, D.C. 20036

James Blaszk
Stephen Rosen
Levine, Blaszk,
Block & Boothby, LLP
Counsel for the Ad Hoc
Telecommunications Users Group
2001 L Street, NW, Suite 900
Washington, D.C. 20036

Qualex International
Portals II
445 12th Street, S.W.
Room CY-B402
Washington, D.C. 20554